

FILED

07/18/2022

**U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Roger A.G. Sharpe, Clerk**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
TOMMIE THEODIS GORDON, JR.,)
)
Defendant.)

Cause No: 1:22-cr-00086-JPH-DML

INFORMATION

The United States Attorney charges that:

COUNT 1
18 U.S.C. § 922(g)(1)
Possession of a Firearm by a Prohibited Person

On or about February 9, 2022, in Marion County, within the Southern District of Indiana, the defendant, TOMMIE THEODIS GORDON, JR., did knowingly possess in commerce and affecting commerce a firearm, to wit: a Kel-Tech .22 handgun (Serial Number: WYOR67), after having knowingly been convicted of one or more crimes punishable by imprisonment for a term exceeding one year,

To wit: Residential Entry, in Marion County (Indiana) Superior Court, Criminal Division 14, on or about February 20, 2009.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT 2
18 U.S.C. § 922(g)(1)
Possession of a Firearm by a Prohibited Person

On or about March 28, 2022, in Marion County, within the Southern District of Indiana, the defendant, TOMMIE THEODIS GORDON, JR., did knowingly possess in commerce and affecting commerce a firearm, to wit: a Rainer .223 RM15 rifle (Serial Number: RA3234), after having knowingly been convicted of one or more crimes punishable by imprisonment for a term exceeding one year,

To wit: Residential Entry, in Marion County (Indiana) Superior Court, Criminal Division 14, on or about February 20, 2009.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE

1. The allegations contained in Counts 1 and 2 of this Information are hereby realleged and reincorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

2. Upon conviction of one or both of the offenses in violation of 18 U.S.C. § 922(g)(1) set forth in Counts 1 and 2 of this Information, the defendant, TOMMIE THEODIS GORDON, JR., shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense(s), including but not limited to:

a. One Kel-Tech .22 handgun (Serial Number: WYOR67) seized from the Defendant on or about February 9, 2022;

b. One Rainer .223 RM15 Rifle (Serial Number RA3234) seized from the Defendant on or about March 28, 2022; and


c. Ammunition seized from the Defendant on or about February 9, 2022 and on or about March 28, 2022.


3. If any of the property described above, as a result of any act or omission of the Defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

All pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).


Nicholas J. Linder
Criminal Chief


Kathryn E. Olivier
Assistant United States Attorney